

AMENDED Exhibit 906

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

Communities - Safety Mitigations

Last Update: Dec 13, 2022

Context

This doc outlines current safety measurements, and aims to align on additional safety mitigation toolings to support high school communities.

Communities (Colleges & high schools) are private groups in which members can add friends and post to a common Story. Snapchatters are required to verify their .edu email to join their College Community. Users can find and onboard to College Communities in My Profile.

Colleges are rolled to 100% of US users on Aug, 26. Since then, 640K users from across 1,233 US colleges and universities have adopted Colleges. Everyday, 420K users view over 35M Colleges stories, on average 80 Snap views per person. Every College Snap receives 1,000 views on average (source). We are working on bringing the same UX to high school communities, target to launch in Q1, 2023.

Currently the member size cap is 6K for College Communities. The top 20 college groups have over 2,000+ users and contribute to over 30% of Story posting and viewing (Our average college group size is 160).^[A2] Since launch

- Report rate has been low (0.5% Snap are being reported, 40K Snap Posts a day with 200 being reported)^[A3]
- Enforcement rate (23%) and removal rate (25%) is on par with other content
- Self-regulation is common - students posting snaps to ask other students to stop inappropriate behaviors.

^[N4]

Discussion topics:

- Review product flows
- Discuss email verification challenges and solutions
- Review updates on mitigation plans

High school target launch date

Q1, Mid-Feb, 2023

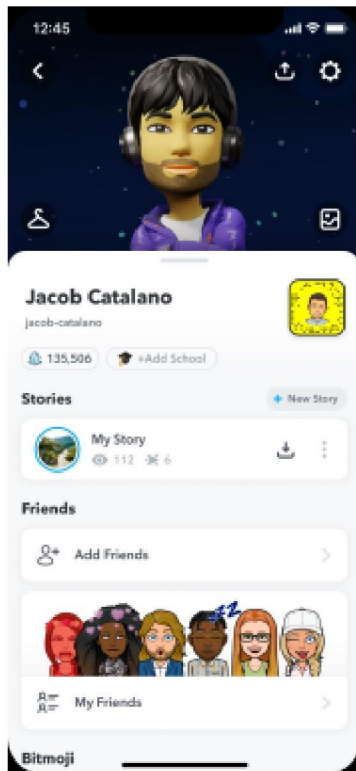
High school onboarding user flows

Entry point in My Profile (shared with College)

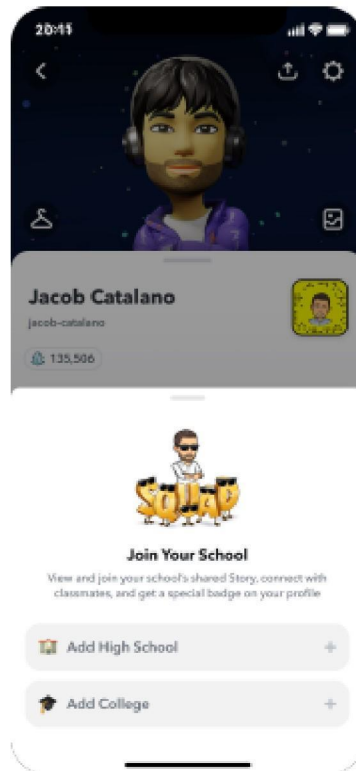
Select college or high school community

Find your high school

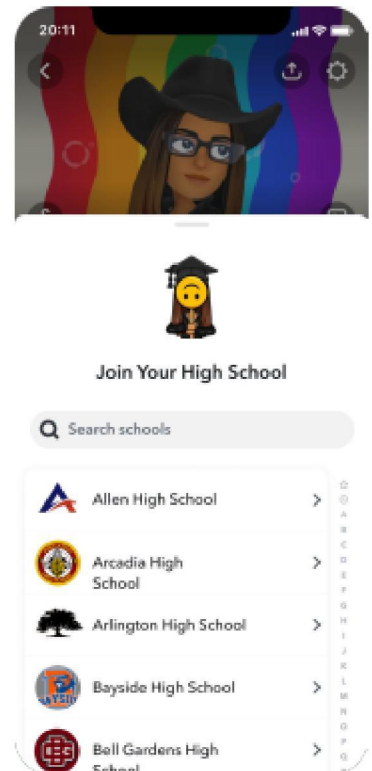
- A1 Do we have any more information on these Top 20 Communities and how their behavior might be different than other Communities? Do we have any rates of engagement with the Communities content and the number of people who remove themselves from a Community?
Allhea Tupper, 11/16/2022 04:36 PM
- A2 +1 on understanding this
Aaron Altschuler, 11/18/2022 07:58 AM
- A3 have we done any random sampling to assess what's out there? [REDACTED]
[REDACTED]
Alex Osborne, 5/9/2023 11:03 PM
- N4 are we kicking people out of stories?
Nona Yadegar, 11/17/2022 04:03 PM



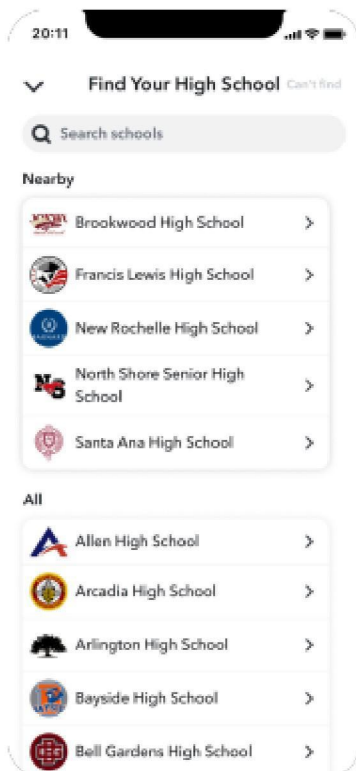
Find you high school full screen



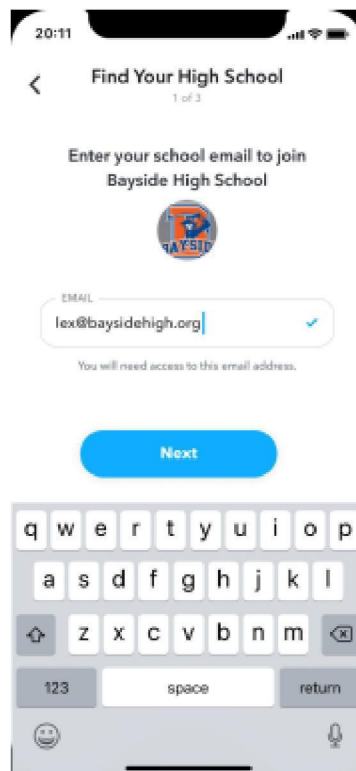
Enter your school email



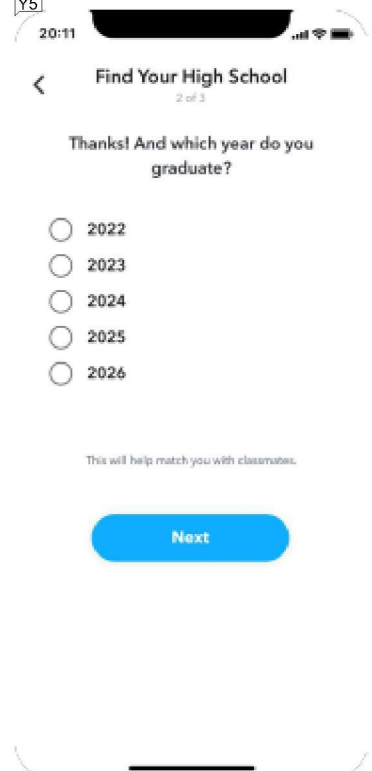
Select your graduation year



Confirmation page after submitting email



If your school is not on the list yet, you can submit your school

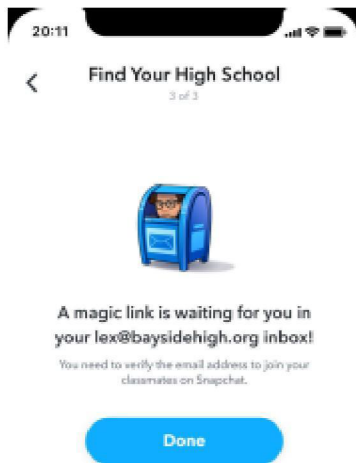


Enter school info to help us create your school

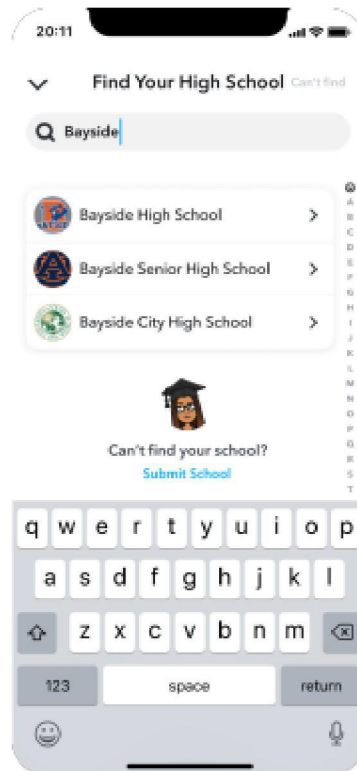
Y5

Is there a chance someone who graduated can still have access to hs email, and onboard through this flow?

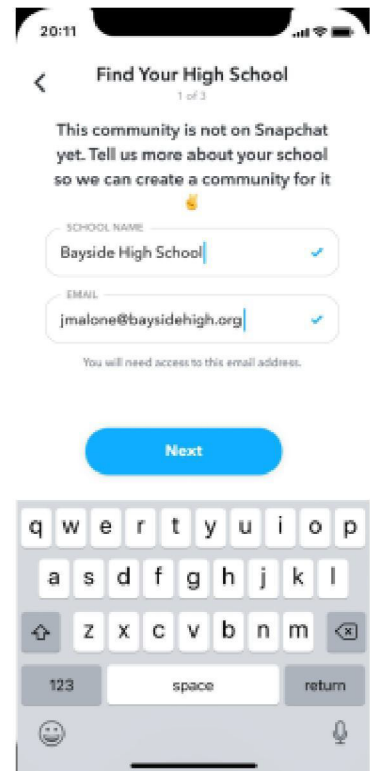
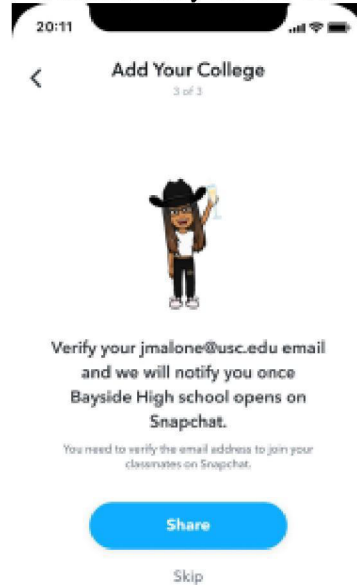
[REDACTED] 12/19/2022 01:23 PM



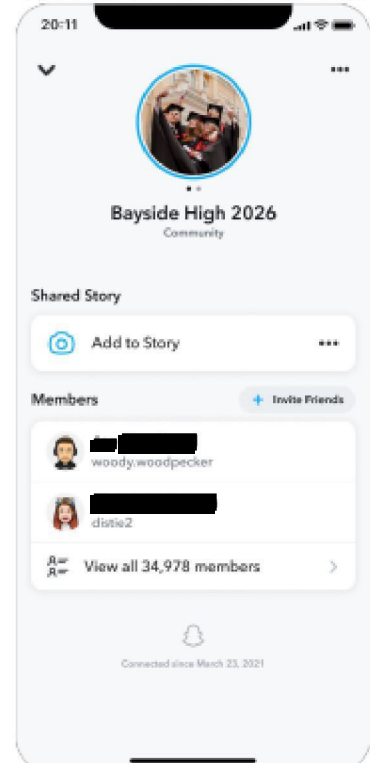
Enter graduation year so that we can put you in the right group



Confirmation page, verify your email to stay on the list



Community Profile, once you become a verified member



Current measures in place for T&S:

(PICO doc, last updated Nov 15, 2022)

We will rely on the standard defenses for **public user generated content**:

- Group size is capped at 6,000 members
- School email verification is required to join your High School Story
- In App Reporting
 - Both stories and accounts will be reportable.
 - Reports are being prioritized in the queue.
 - Content will be viewable in the Stories tab in Orca.
- Proactive Detection - CSAM, Autobot and Rapid Rules
 - Rapid Rules: currently detect drug and firearm sales, and commercial sexual exploitation.
- Abusive Language Detection on captions
- Platform level Strike System^[L6]
 - Drug Sales: [REDACTED]
 - Sexual harassment: [REDACTED]
 - Adult Sexual Exploitation/CST: [REDACTED]
 - Conditionally Prohibited Substances: [REDACTED]
 - Sexual Content - Nudity, Sex Acts, Pornography: [REDACTED]

[N7]

Additional mitigation (updated Nov 7, 2023 aligned and agreed with safety, legal, platform policy, and privacy)

- In addition to current rapid rules, test additional rules to scan for shooting/boom threats for community snap content (@ [REDACTED])
- Start random sampling of community Snaps for prevalence measurement. The sampled content will go through human moderation and give us a baseline of abuse in the community. ([REDACTED])
- Document and build escalation path / tooling for content investigation so that we can respond to community outreach quickly. The toolings should help T&S operation to look up group id and locate/review content. (@ [REDACTED])
- Treat community content (snap + group chat) as public content, which should apply more rapid rules for proactive scanning
 - need to update the copy to cover these use cases

Email / Identity verification

We learned that it's common for large public school districts to share the same email domain across multiple schools within the district. (These challenges do not apply to private schools). This introduces two challenges:

1. **The same email domain is matched to multiple high schools.**
 - a. Challenge: unlike college, we won't be able to identify the high school based on the email address users provide.
 - b. Risks: Students join another high school in the same school district with the same email domain.

Page 4 Comments

- L6 9 harms, will update
[REDACTED] 5/9/2023 11:09 AM
- N7 does this block a snap or trigger a report?
Nona Yadegar, 11/17/2022 04:11 PM

- c. Solution: Our solution is to update the onboarding flow to identify the school first, and then email. Instead of asking users to enter their email first (this is how college onboarding flow works), we have users find and select their high school from the list first and submit their email. We then validate if the email domain matches the given school info.
2. **In some cases, the same email domain also applies to high school and middle schools in the district.**
- a. Challenge: we can't tell for sure if the user is a high school student.
 - b. Risks: middle schoolers could potentially join a high school group.
 - c. Solution: enforce age gating and only enable this feature for [REDACTED] [REDACTED].

L10

Escalation Slack Channel

Mitigation guide reference notes

- If further action is needed, please reach out to channel **#community-safety-escalation**
- Provide information:
 - Group id
 - Violation reasons
 - Expected actions: delete the whole group, or delete the whole Story

Strike System

We plan to rely on the platform level Strike System for high school communities, without building feature level strike actions this quarter. Our original plan was to build a [community feature level strike system integration](#) to remove bad actors from the group after the level strike threshold is met, and ban said users from re-joining a community for 30 days. However, after looking at the Strike System's roadmap we believe that the platform level policies will be sufficient for high school launch.

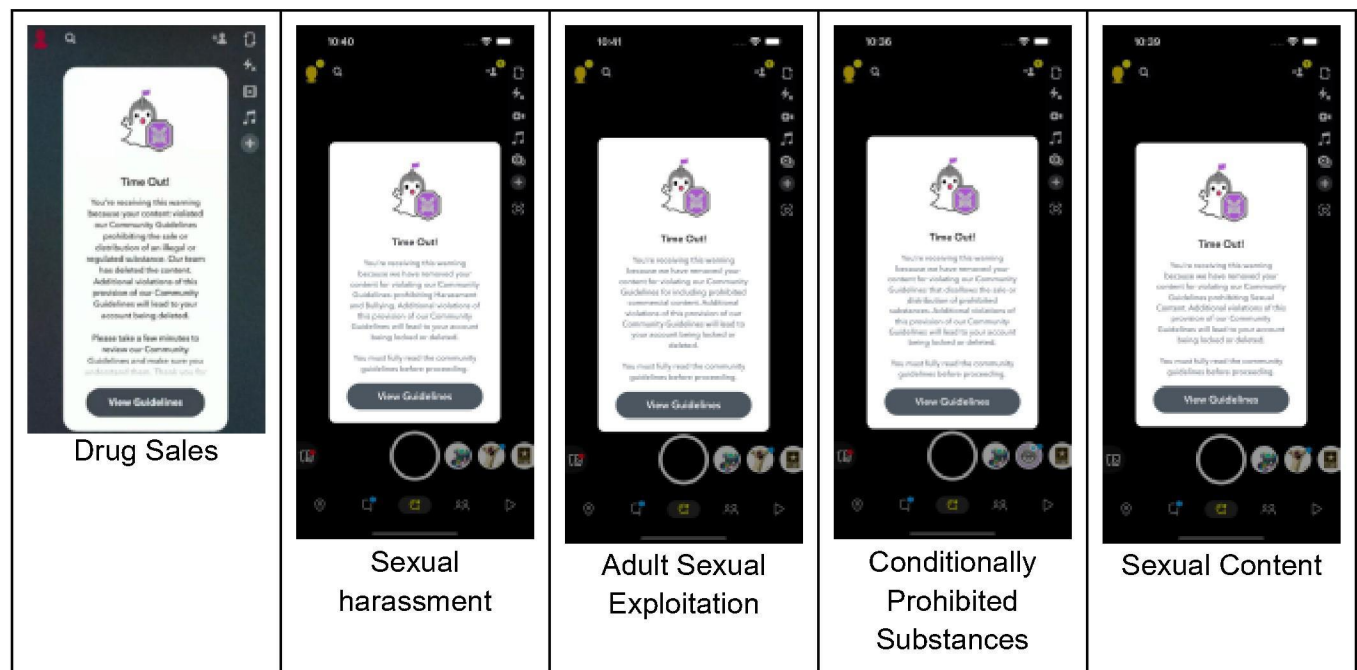
By the end of Q4, we will have 5 platform-level policies that will also apply to Community content. In addition to the Drug Sales policies, we are rolling out 4 additional policies in December. When we delete a user's content for violating our policies, we will also send the account an in-app warning stating the reason for enforcement and explaining that additional violations will result in account level enforcement. On the backend we will apply a strike against the account (max [REDACTED]) and will enforce on the account when it meets our strike threshold.

- Drug Sales: [REDACTED]
- Sexual harassment [REDACTED]
- Adult Sexual Exploitation/CST: [REDACTED]
- Conditionally Prohibited Substances: [REDACTED]
- Sexual Content - Nudity, Sex Acts, Pornography: [REDACTED]

We believe that this is a good starting point for us to maintain a safe environment for high school communities and guide our feature level strike system design. Some of the key components needed for the feature level strike system is still being developed by the T&S team, and plan allows the T&S team

- L8 adding a section about escalation [REDACTED] please add
the rest of the team in this channel
[REDACTED], 4/5/2023 08:22 PM
- L9 can you let me know if anything else is needed?
[REDACTED], 4/5/2023 08:27 PM
- L10 change this into email
[REDACTED], 5/12/2023 01:15 PM

to remain laser focused on building these foundational features that will enable feature level integration down the road.



Additional mitigation plans

We evaluate the current, existing mitigation tools on the platform with both the Strike System and support site escalation flow. Here are our conclusions / recommendations.

Escalation flow on support site

This quarter we will be working with the T&S team to design the reporting / escalation flow on our support site (P1). This requires us to specify what information to collect (how to design the form) and how to handle the tickets. This is a P1 (instead of a P0) in Q1 because parents, teachers and school admins can already reach us via existing methods built for communities. An having an additional community escalation flow should not be a launch blocker.

- **To report a safety concern:** they can follow the "Report safety concern" flow on the support site. Community content is most likely be categorized as a "Story" (a high school story, the class story, etc), and users can write in their concerns. ^{M12}

L11 do you know what happens to "Story" safety concern tickets today?

[REDACTED]
[REDACTED], 12/13/2022 05:07 PM

M12 Hi [REDACTED] - I believe it's just a regular workflow that is routed to the appropriate queue based on the nature of the report.

[REDACTED]
[REDACTED] to confirm
Matt Jackson, 12/13/2022 05:21 PM

- **To provide feedback:** Today, users can already send us feedback and suggestions under the “A Community” section in Setting > I Have a Suggestion > Profile > A Community”. This flow should be sufficient for us to collect feedback from teachers and parents.

1. Strike System (system design doc)^{L13}

- What should the thresholds be for Communities enforcement?
 - Threshold:** [REDACTED]^{N14}
 - Note: at most cases, [REDACTED] will result in lock account on the platform^{J15}
- What should the strike actions be for Communities
 - Any enforcement that result in content deletion (snap/story) should be counted as a strike [REDACTED]
 - Upon meeting the strike threshold for communities, the account loses access to the community product^{N16}
 - Note:
 - We will also count violations on community stories as a strike on the Snap Platform
 - Any reports that lead to lock account (both automatically and manually) should lock account immediately
- In-app education

L13 [REDACTED] FYI on context

[REDACTED], 12/5/2022 11:07 AM

N14 and then u are out?

Nona Yadegar, 11/17/2022 04:04 PM

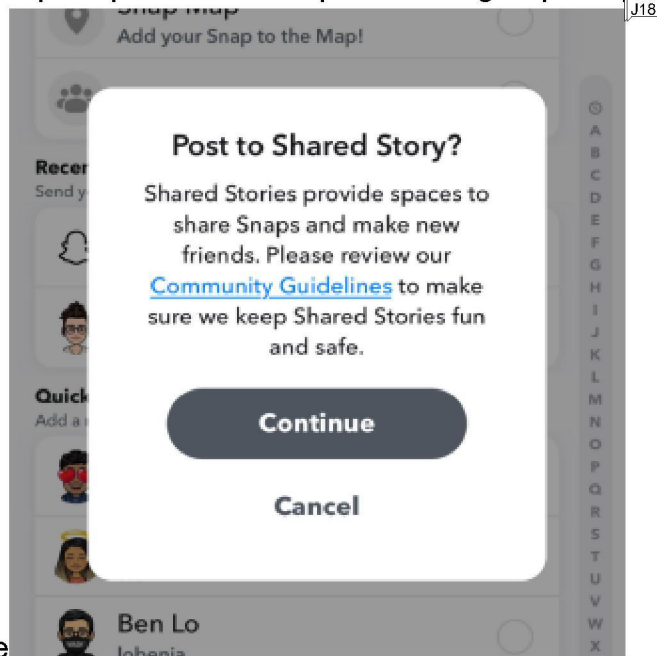
J15 Should it just kick you out of the high school rather than lock your account?

Jeremy Voss, 11/17/2022 04:14 PM

N16 do they ever regain? feels like it should be more limited maybe

Nona Yadegar, 11/17/2022 04:05 PM

- i. Show prompt when users post to the group story for the first



- time
- ii. After the account receives the [REDACTED] [REDACTED] [REDACTED] when they attempt to post again, a warning is shown to the user (about being banned if receives a strike again)^{N19}

- d. User Experience of communities ban

- i. Once the user meets the threshold, they will be removed from the specific community and they will not be able to join any other community^{N20}
- ii. Note: locked accounts will have access to appeal

- e. Appeals User Experience

- i. There will be not be a standalone appeals process for communities
- ii. If a locked account (that has also lost access to the communities product) is reinstated, then we will re-enable access to communities

2. Escalations Flow^{A22 D23}

- a. Let parents/schools (principals , school admins, counselors) reach out and give us feedback
- 1 | i. Enable in our [support site](#) (Will reach out to [REDACTED] [REDACTED] [REDACTED] [REDACTED])^{N24}
- b. Treat these reports as regular user feedbacks and follow the same escalation flow as the rest of user reports
- c. **[WON'T DO]** Won't do the following
- i. Information required for escalation
- Full name, School name, Address and Phone, Staff/faculty email address
 - Employee/staff ID (Validation - school staff directory: [example](#))^{M25 N26}
- ii. Review process^{M27}
- Check with Ops
 - Validate the request and requestor
 - Review and take enforcement actions (see below) on the specific content and/or community^{M28}
- iii. Actions:

- N17 i think we could work on this copy! i'd love to help
Nona Yadegar, 11/17/2022 04:05 PM
- J18 +I think this can be more specific about High School and why that is especially important to keep safe
Jeremy Voss, 11/17/2022 04:16 PM
- N19 great
Nona Yadegar, 11/17/2022 04:05 PM
- N20 i think we can do this for 30d or something like that but maybe then if someone keeps getting kicked out ...?
Nona Yadegar, 11/17/2022 04:06 PM
- M21 [REDACTED] for visibility (Aaron - I briefed this to you already. The group is moving towards a different consensus on how to accommodate school admins by allowing them to just join the groups themselves).
Matt Jackson, 11/18/2022 05:13 AM
- A22 Thanks. We don't have the FTE bandwidth to accommodate this type of personalized, high-touch workstream, and it wouldn't be appropriate to give to vendors.
Aaron Altschuler, 11/18/2022 08:03 AM
- D23 this seems like an absolute critical blocker before launching high schools. Need to give some recourse to school administrators if they believe this feature is disruptive.
David Boyle, 11/16/2022 04:52 PM
- N24 they will prob ask us to completely remove the feature? if we are taking specific reports we need to validate the reporter;s identity? or just investigate? whats retention of community snaps?
Nona Yadegar, 11/17/2022 04:07 PM
- M25 Who is validating this? How will we know these are who they are claiming to be?
Matt Jackson, 11/17/2022 04:06 PM
- N26 this feels like something we are not equipped to do with major privacy considerations
Nona Yadegar, 11/17/2022 04:08 PM
- M27 Does this workflow exist for other teams at Snap besides LEO?
Matt Jackson, 11/17/2022 04:07 PM
- M28 Is T&S taking enforcement action based on the word of an official or just what we can verify in-app?
Matt Jackson, 11/17/2022 04:08 PM

- Remove members
- Delete Snaps/Stories
- Disband community^{M29}

3. Identity verification^{M30} for high school students^{S41}

- We will rely on using high school email for identity verification

[WON'T DO] 4. Self-Regulation: Introduce a moderator role for communities ([similar to Shared Stories](#))^{J42}

- Members can request to be a moderator for the group
 - Snapchat will evaluate whether they are qualified to be a moderator (and ranked against each other if there are more than 1 candidates) depending on the following factors:^{L43}
 - Time on Snapchat: has to be a Snapchat user for more than 1 year
 - Snap score: has to have more than 5,000 Snapscore
 - Friend count: more than 50 friends
 - No content violation in the last 180 days
 - And more ...
 - There can be up to 5 Moderators of a Shared Story
 - Moderators:
 - Can add / remove / ban members
 - Can remove any Snaps
 - Cannot remove other Moderators
- If a member is removed by a moderator, this user cannot join any community for 48 hours.
- How to educate moderators when to take action
 - Need to add code of conduct in our support site ([reference Reddit](#)), and prompt moderators to read it prior to granting moderator role
- How to manage moderators if they abuse the role?
 - Subject to the strike system

[NOT DECIDED YET] 5. Auto-moderation? [open question: when should we implement this]

- Which auto-moderation policy we apply to?
 - Public content
- [open] Content moderation to count as strike?
 - Platform integration of auto-moderation + strike in Q1, 2023. We can apply this change to communities after that as well

[OPEN] 6. Proper and additional reporting to LEO

- TBD

- M29 We don't have this tooling for Communities, will this be built for this feature?
Matt Jackson, 11/17/2022 04:16 PM
- M30 I want to be sure I understand the verification piece. Would teachers at the school be able to join the community? I'm concerned about mutual friend/student ID verification.
[REDACTED] [REDACTED], 11/17/2022 04:07 PM
- D31 do we know how we can even build a database of high schools in the US? maybe our friends in maps team would have tips?
[REDACTED]
David Boyle, 11/16/2022 04:50 PM
- L32 we have database of colleges with data provided by the maps team (thank you friends), and can do the same for high schools [REDACTED] fyi
[REDACTED] [REDACTED], 11/16/2022 05:30 PM
- S33 We have a database of 38,000 high schools from building hags.app (snapchat world for high schools), which we can use easily
[REDACTED] [REDACTED], 11/16/2022 05:36 PM
- S34 Wouldnt need to build any of it from scratch
[REDACTED] [REDACTED], 11/16/2022 05:37 PM
- J35 IME you can buy this stuff, but you should plan for some manual cleaning and think about how to handle "multiple school in the same building", "school is non-contiguous", etc. The last time I had to do this we bought the polygons from Factual (and maybe a couple other places), it was doable but you have to do a lot of cleanup, and then figure out some way to store the diffs you added so when you get the new drop from the provider you can re-apply your cleanups, etc.
Jeb Boniakowski, 11/16/2022 05:41 PM
- J36 But yeah there's only like, tens of thousands high schools, thousands of colleges, so even if you have to do something by hand for every one it's not a huge deal.
Jeb Boniakowski, 11/16/2022 05:44 PM
- S37 This is similar to what we did at hags for the list — we purchased all available databases online, combined them, cleaned manually, and allowed students to submit missing schools for us to manually add
[REDACTED] [REDACTED], 11/16/2022 05:51 PM
- R38 [REDACTED] can you weigh in on Verrazano data for high schools? We usually use these locations to block certain content, but it's probably complete. We also have an understanding of "campuses" - schools belonging to a larger campus, but not sure the status. In general check in with maps before building any own place datasets, we might already have something you need.
[REDACTED] [REDACTED], 11/16/2022 07:21 PM
- S39 Verrazano (Snap's Places Database) has about 16K Places with category = "high schools" in US. Likely more but they might be categorized just as "School" or "Education" (Verrazano has about 25K total high schools all over the world, but the categorization gets a little tricky as high school system is not followed in every country.. e.g in India, its just school)

Based on this govt's website, there are a total of 23,499 High Schools in US
(<https://nces.ed.gov/fastfacts/display.asp?id=84> I think this can be trusted)

out of the 16K High schools we have in US, about 60% of them have a fence attached, so we know the school's boundary.

Verrazano over the years have gotten a few requests pertaining to high schools, and based on

S39+ one we have is also small enough where we could do something manual.

Happy to discuss or if anyone needs more details on the stats and links to our explorer tool to view these places.

[REDACTED] 11/16/2022 07:44 PM

L40 + [REDACTED] fyi, [REDACTED] we will find time to discuss this, we can definitely use the places data for high school launch!

[REDACTED] 12/14/2022 02:49 PM

S41 sounds good.. lmk!

Also adding Places PM [REDACTED]

[REDACTED], 12/14/2022 02:55 PM

J42 note from meeting: we will not do this

Jeremy Voss, 11/17/2022 04:29 PM

L43 [REDACTED] m any other factors we should consider to decide if a user is legit and should be a moderator of the group?

[REDACTED], 11/15/2022 04:46 PM

Appendix

Additional mitigation Oct 17, 2023 - [Alex Osborne](#), [REDACTED] [REDACTED] [REDACTED] [REDACTED]

- In addition to current rapid rules, test additional rules to scan for shooting/boom threats for community snap content (@ [REDACTED])
- Start random sampling of community Snaps for prevalence measurement. The sampled content will go through human moderation and give us a baseline of abuse in the community. (@ [REDACTED])
- Document and build escalation path and tooling for content investigation so that we can respond to community outreach quickly. The toolings should help T&S operation to quickly up group id and locating content. (@ [REDACTED])
- Work with Comms and Safety Ops to draft standard response to address community outreach from schools staff going forward (@ [REDACTED])

T&S Prep at launch (Sept, 2022)

1. Build Monitoring (similar to this [dash](#), [looks](#)) [REDACTED]

- Volume and Enforcement Rate of Snaps detected proactively (RR, CSAM, etc.)
 - Overall
 - By Reason
- Volume and Enforcement Rate of Snaps Reported ([this look](#))
 - Overall
 - By Reason
- Volume and Enforcement Rate of Accounts Reported
 - Overall
 - By Reason
- Snap Report Rate
 - By Impressions: Sum of Snap Reports over Sum of views on Snaps
 - Overall
 - By reason
 - By Story Create Volumes: Sum of Snap Reports over Sum of Communities Snaps Created
 - Overall
 - By reason
- [WIP] Deletion Validation: # of Impressions (on communities) received by Snaps and Accounts after they are deleted or locked

2. End to End Testing of Flows [REDACTED] [REDACTED] [REDACTED]

- i. [complete] Reporting Flow: Ensure content and accounts get reported and enqueued into the correct workflow
- ii. [complete] Enforcement Actions: Ensure content and accounts that get enforced on by PIE/T&S are actually being removed and not getting any additional views
 - Ignore and Delete Snaps
- iii. [Cannot test] Proactive Detection: Ensure content goes through existing proactive detection via Rapid Rules and CSAM/PhotoDNA [REDACTED]

[R48]

4. Other T&S Tooling requests:

Page 10 Comments

L44 [REDACTED] is there a standard procedure to test this? We can't find an easy way to test this

[REDACTED], 10/13/2022 10:00 AM

R45 [REDACTED] or [REDACTED]

[REDACTED] 11/16/2022 04:51 PM

T46 [REDACTED] We do have a process for E2E CSAM testing by marking contents with specific test user ids. Details in this doc: https://docs.google.com/document/d/1xxqEyFE8R2O8OT3CxW3fmPZuKzpb_46cRxb9JB-wjI/edit#heading=h.byt7p0pyfw4k.

Just so I understand, are we creating a new type of stories or posting an existing story type? And are the stories sent to our autobot system for scanning?

[REDACTED] 11/17/2022 08:06 PM

N47 can we have tools to time out and eventually ban bad actors from certain groups? ex 3 enforcements after being reported in a group and u are out? or 2 and u get a 24 hour time out? etc

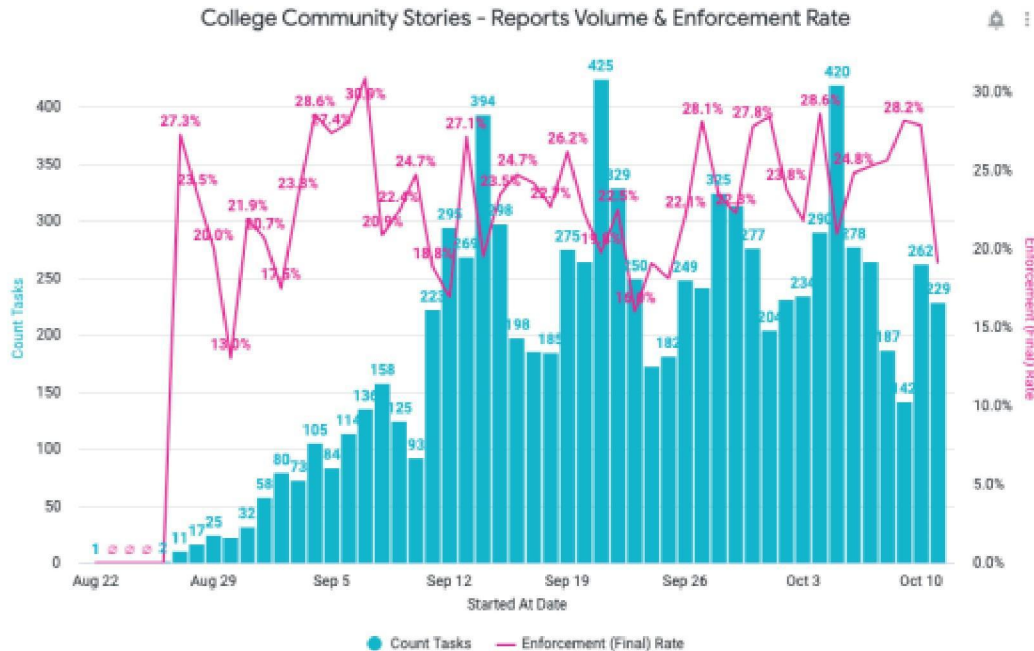
Nona Yadegar, 9/19/2022 09:47 AM

R48 Certainly in scope for this point

[REDACTED] 9/30/2022 01:19 PM

- iv. **[Not scoped]** Labels for Communities tasks in OhSnap
- v. **[Not scoped]** Within OhSnap, only FTEs should be able to delete/disband Communities, we want to disable this function for our vendor teams

User report volume and enforcement Rate



Using Friend Graph to verify identity (High School)

Apr 3, 2023

- feedbacks
 - [P0] Graduate limit - if someone has over x thousand pending friend link we can double the threshold / Atlas, friend links of all types
 - [P0] New reporting option "this person doesn't go to my school" in these types of story
 - More targeted review workflow for these groups
 - [P0] Rate limit how many schools you can join for x days
 - [P0] Verify the email is a real email
 - [P1] If they have Family center then they don;t need to have many friends

Track Changes

1 Delete [REDACTED], 12/13/2022 10:10 AM